



April 7, 2022

BY ECF

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Hon. Gregory H. Woods
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street, Room 2260
New York, NY 10007

**Re: *United States of America and States of the United States, ex rel.
Donohue v. Richard Carranza, et al.*, 1:20-CV-5396 (GHW)**

Dear Judge Woods:

This firm, along with the New York City Law Department, represents defendants New York City Department of Education and its former Chancellors, Richard Carranza and Meisha Porter; this firm also represents defendants the Board of Education of the City of Chicago (identified as the Chicago Public School District in Relator's Second Amended Complaint (ECF No. 19) (the "SAC")) and its former Superintendent, Jose M. Torres, PhD, and the Los Angeles Unified School District and its former Superintendent, Austin Beutner (collectively, the "School Districts") in the above-referenced case. In accordance with Rule 1(A) and 2(C) of the Court's Individual Rules & Practices, we write to request permission for an additional two pages (five pages instead of three) for a letter that we are preparing that will request a pre-motion conference regarding a proposed motion to dismiss the SAC. We intend to submit one letter on behalf of all School Districts instead of a separate letter for each School District. Relator's counsel has consented to this request.

Respectfully,

/s/ Joseph V. Willey
Joseph V. Willey

Cc: All counsel of record, via ECF

ENDORSEMENT:

Pursuant to the Order at ECF No. 6, dispositive motions have been referred to Judge Aaron for Report and Recommendation. Judge Aaron does not require a pre-motion conference for the School Districts to file their anticipated motion to dismiss. No later than April 15, 2022, the parties shall submit a proposed briefing schedule for the School Districts' anticipated motion to dismiss. The Clerk of Court is respectfully directed to terminate the gavel at ECF No. 121. SO ORDERED.

Dated: April 8, 2022

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